

# **EXHIBIT A**

## **Declaration of Susmita A. Gadre in Support of Geotab USA, Inc.'s Rule 11 Motion for Sanctions**

James J. Pisanelli, Esq., Bar No. 4027  
JJP@pisanellibice.com  
M. Magali Mercera, Esq., Bar No. 11742  
MMM@pisanellibice.com  
PISANELLI BICE PLLC  
400 South 7th Street, Suite 300  
Las Vegas, Nevada 89101  
Telephone: 702.214.2100  
Facsimile: 702.214.2101

Michael A. Albert (*pro hac vice*)  
Hunter D. Keeton (*pro hac vice*)  
Susmita A. Gadre (*pro hac vice*)  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
617.646.8000 Phone  
617.646.8646 Fax  
malbert@wolfgreenfield.com  
hkeeton@wolfgreenfield.com  
sgadre@wolfgreenfield.com

*Attorneys for Defendant Geotab USA, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

WirelessWerx IP, LLC,

Plaintiff,

v.

Geotab USA, Inc.,

Defendant.

Case No. 2:23-cv-01769-CDS-DJA

**DECLARATION OF SUSMITA A.  
GADRE IN SUPPORT OF GEOTAB USA,  
INC.'S RULE 11 MOTION FOR  
SANCTIONS**

1 I, Susmita A. Gadre, declare as follows:

2 1. I am an associate at the law firm of Wolf, Greenfield & Sacks, P.C. and counsel  
3 of record for Defendant Geotab USA, Inc. I have personal knowledge of the facts stated in this  
4 declaration and, if called as a witness, could and would testify competently to those facts.  
5

6 2. Attached as Exhibit B is a true and accurate copy of the “Geotab GO vehicle  
7 tracking device” page on Geotab USA’s website, available at [https://www.geotab.com/vehicle-](https://www.geotab.com/vehicle-tracking-device/)  
8 [tracking-device/](https://www.geotab.com/vehicle-tracking-device/). This screenshot was captured on November 6, 2023.

9 3. Attached as Exhibit C is a true and accurate copy of the “A look at the Geotab  
10 GO Device: Past, present, and future” page of Geotab USA’s website, available at  
11 <https://www.geotab.com/blog/geotab-go-device-past-present-future/>. This screenshot was  
12 captured on November 6, 2023.  
13

14 4. Attached as Exhibit D is a true and accurate copy of the “Geotab Partner  
15 Downloads” Geotab USA’s website in 2004, as displayed in an archived copy from the Internet  
16 Archive (also known as the Wayback Machine), available at  
17 <https://web.archive.org/web/20041208221215/http://www.geotab.com/Downloads/index.htm>.  
18 This screenshot was captured on November 6, 2023.  
19

20 5. Attached as Exhibit E is a true and accurate copy of a User Guide for  
21 CHECKMATE by Geotab, which was the software used by Geotab USA at the time. This user  
22 manual was available for download on Geotab USA’s website, as seen on page 1 of Exhibit C  
23 (the “GEOTAB Checkmate User Manual”). This manual was available at least as early as 2004,  
24 as evidenced by Exhibit C, and the metadata of the version downloadable from the Internet  
25 Archive says that the document was last modified on August 31, 2004. The particular copy that  
26 is present in Exhibit E was downloaded on November 6, 2023.  
27  
28

1           6.       Attached as Exhibit F is a true and accurate copy of a document filed by the  
2 defendants in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas).  
3 This document is ECF No. 13, Defendant Raytheon Techs. Corp.'s Rule 12(b)(6) Motion to  
4 Dismiss Plaintiff's Complaint, filed March 2, 2023.

5  
6           7.       Attached as Exhibit G is a true and accurate copy of a document filed by the  
7 defendants in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas).  
8 This document is ECF No. 19, Defendant Raytheon Techs. Corp.'s Reply in Support of Its Rule  
9 12(b)(6) Motion to Dismiss Plaintiff's Complaint, filed March 23, 2023.

10  
11           8.       Attached as Exhibit H is a true and accurate copy of a document filed by the  
12 plaintiffs in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas). This  
13 document is ECF No. 25, Notice of Voluntary Dismissal, filed June 5, 2023.

14           9.       Attached as Exhibit I is a true and accurate copy of a document filed by the Court  
15 in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas). This document  
16 is ECF No. 26, Order, filed June 6, 2023.

17  
18           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
19 knowledge and belief.

20  
21       Date: December 4, 2023

/s/ Susmita A. Gadre  
Susmita A. Gadre  
sgadre@wolfgreenfield.com  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
617.646.8000 Phone  
617.646.8646 Fax

*Attorney for Defendant Geotab USA, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on the below date. Any other counsel of record will be served via email and first-class mail.

Date: December 4, 2023

/s/ Susmita A. Gadre

Susmita A. Gadre